



201-16810

COLOR PIGMENTS MANUFACTURERS ASSOCIATION, INC.

July 20, 2009

Mark W. Townsend, Chief
HPV Chemicals Branch
Environmental Protection Agency
Office of Pollution Prevention
and Toxics
1201 Constitution Avenue, NW
Washington, DC 20004

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2009 JUL 21 PM 1:32

**Re: Response to EPA Comments on the CPMA Test
Plan for C. I. Pigment Violet 19 (Chemical
Abstracts Service ("CAS") Number 1047-16-1, C.I.
Pigment Red 122, CAS No. 980-26-7 and
Dihydroquinacridone, CAS No. 5862-38-4**

Dear Mr. Townsend:

I am writing on behalf of the Color Pigments Manufacturers Association, Inc. ("CPMA") in response to your letter of April 21, 2009 in which you review the Environmental Protection Agency's ("EPA") comments on the CPMA Test Plan (the "Test Plan") and robust summaries for C.I. Pigment Red 122, Quino(2,3-b)acridine-7,14-dione,5,12-dihydro-2,9-dimethyl Chemical Abstracts Service ("CAS") No. 980-26-7); C.I. Pigment Violet 19, Quino(2,3-b)acridine-7,14-dione,5,12-dihydro, CAS No. 1047-16-1, (jointly the "Quinacridone Pigments") and Dihydroquinacridone, CAS NO. 5862-38-4. The Test Plan was submitted to the EPA as part of the voluntary High Production Volume ("HPV") testing program.

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The CPMA is an industry trade association representing color pigment companies in Canada, Mexico, and the United States. CPMA represents small, medium, and large color pigments manufacturers throughout Canada, Mexico and the United States, accounting for the bulk of the production of color pigments in North America. Color pigments are widely used in product compositions of all kinds, including paints, inks, plastics, glass, synthetic fibers, ceramics, colored cement products, textiles, cosmetics, and artists' colors. Color pigment manufacturers located in other countries with sales in Canada, Mexico, and the United States and suppliers of intermediates, other chemicals and other products used by North American manufacturers of color pigments are also members of the Association.

CPMA intends to submit additional data with respect to the Quinacridone Pigments. We are currently collecting information used previously in the preparation of the Test Plan and additional data from archive records. We are also searching for new data developed in the years since the Test Plan was submitted to EPA. We intend to submit this additional data within sixty days of this letter. This additional data will include experimental solubility

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and log octanol/water partition coefficient study summaries that were not available when the Test Plan was submitted to EPA.

CPMA is also reviewing available relevant information specific to the intermediate chemical Dihydroquinacridone. We anticipate that additional information will be available on the use and safety of this intermediate chemical.

CPMA makes no commitment with respect to the Quinacridone Pigments discussed above or any guideline or requirement established pursuant to the voluntary HPV program or otherwise. Furthermore, CPMA reserves the right to defer the review of this chemical if it or an analog has been the subject of another undertaking in any EPA program or other similar international programs.

CPMA further reserves the right to withdraw the Test Plan should the HPV program, when and if finalized, prove to be different from that understood, from time to time, by CPMA. Since all of the pigments and intermediates represented by CPMA have been used in international commerce for many years, there is extensive data available from a variety of published and unpublished sources.

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Thank you for your attention to this matter. Please call me
if there are any questions or comments.

Sincerely,

J. Lawrence Robinson
President